

UNITED STATES OF AMERICA  
FOR THE DISTRICT OF MASSACHUSETTS

MOTION FOR ENLARGEMENT OF TIME

The defendant, David Beaulieu, hereby moves this Honorable Court to enlarge the time for the filing of discovery and dispositive motions from the current deadline of May 3, 2005 to May 11, 2005. The defendant states the following grounds in support of this motion:

1. Defense counsel needs additional time in which to evaluate and potentially prepare one motion that the defendant may want to file.

2. Pursuant to this Court's Order and Initial Status Report dated March 23, 2005, all time from March 9 through May 11 is excludable. No party will suffer any prejudice from the allowance of this motion, which would give the defendant an additional eight days in which to file motions.

3. Defense counsel has requested and received from the government its assent to this motion.

WHEREFORE, the Defendant requests this Honorable Court to enlarge the time for filing motions from May 3, 2005 through May 11, 2005.

Respectfully submitted,

DAVID BEAULIEU  
By his Attorney,

/s Leslie Feldman-Rumpler

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CERTIFICATE OF SERVICE

The undersigned, counsel for the defendant, hereby certifies that an electronic copy of the within document has been served on all parties of interest.

5/3/05  
Date

/s/Leslie Feldman-Rumpler  
Leslie Feldman-Rumpler, Esq.